

MOYER**Claimant**

and

PEOPLE TO PEOPLE**First Defendant**

and

AMBASSADOR PROGRAMS**Second Defendant**

AFFIDAVIT

I, David Shaddick, Chief Executive of EIL Great Britain, 287 Malvern, Worcestershire, WR14 1AB, UK, state as follows:-

1. I swear this Affidavit to deal with the circumstances relating to the claim made by Mr Joel Moyer and his parents in proceedings brought against Ambassador Programs, Inc. and People to People International, Inc. in Ohio, USA.

2. I am the Chief Executive of EIL Limited ("EIL") a company limited by guarantee and not having a share capital, which is a registered charity. I became a director of the company in July 1999, but resigned in January 2000 when I was offered the post of Chief Executive who I took up on 1st March 2000. Prior to this date the Chief Executive had been Andrew McLeod until his death in February 1999.

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3. EIL is part of a worldwide educational and cultural travel Federation with the first organisation being founded in the USA in 1932 as "the experiment in international living". The British office was founded in Malvern in 1937. This is the oldest homestay educational exchange organisation in the world, operating in over 30 countries. It is a not for profit, non-religious and non-political association. It provides different programmes including residential language courses, homestays, secondary school, adventure and multi-national programmes.

4. EIL is also a member of the Federation of Youth Travel Organisations. This organisation meets annually and in 1997 at its annual meeting, I believe that a representative of the Irish EIL organisation first came into contact with an American organisation with similar purposes called Ambassador International Programs, Inc. EIL UK and EIL Ireland are entirely separate organisations, although for the reasons given above have a close connection in relation to the work they do. EIL UK and EIL Ireland are not owned operated, managed or controlled by Ambassador or by People to People International, Inc. In 1998, Andrew McLeod, then Chief Executive of EIL UK and Kevin Hickey, the National Director of EIL Ireland met representatives of Ambassador following the FYI-TIU conference in Florida. At that meeting they agreed that they would try to work together in the future.

5. EIL and Ambassador subsequently contracted for EIL to provide two programs in 1999 for two groups of American students. EIL Ireland took the lead in planning the project.

6. The first sample itinerary was put forward (for a group in July) involved three days in London followed by visits to Oxford, Worcester, Malvern, Stafford upon Avon, south Wales, overnight travel to Cork, Ireland, then to Dublin, Liverpool, Edinburgh and York. After which, the group was to return to London prior to the return flight to the USA. The intention was that there would be "home stays" in a number of the towns that the group would visit. A sample itinerary may have been provided to Ambassador before a final one was settled.

7. The homestay hosts are usually chosen by local volunteers from a pool of their family and friends. In relation to the trip undertaken by Joel Moyer, our local representative was Mrs. Frances Carney who had been involved in placing homestays since 1994. Prior to that time she had hosted students for various people for approximately 10 years. Her role is a completely voluntary one, and she is not paid a salary and only gets expenses.

8. On the occasion that Joel Moyer was due to be accommodated in Edinburgh, there were about 40 people on the trip. In order to have a sufficient number of hosts for that trip EIL advertised for hosts in various newspapers, including the Edinburgh Daily News.

9. There was a limited response to the advertisement, and a list was drawn up of approximately 10 potential hosts. EIL's local representative phoned each one and then went to see them.

10. Mrs. Carney went to see Mr Carroll both to take a view on him as a host and to investigate his accommodations. She asked him to complete a form and he did. Mrs Carney had a favorable impression of him, and therefore nominated him as a host. EIL then selected

him. If we had any idea that Mr. Carroll would perpetrate a criminal act or in any way harm a trip participant, then we would not have selected him as a homestay host. EIL did not have any reason to know that Mr. Carroll had any propensity to commit any crime.

11. Mr. Carroll was a host twice for the two People to People Student Ambassador Program Groups in 1999. It was during the first hosting that the alleged incident between Mr. Carroll and Joel Moyer took place. A second group stayed in Edinburgh shortly after the first group and Carroll also hosted. Other than the claims by the Moyers, there have been no reports of alleged improper behaviour by Mr Carroll as regards either group. Mrs Carney's interview with Mr Carroll took place before Carroll hosted either group.

12. The only communication that EIL has had with the Moyers was two letters. The first letter was written in January 2000 and it informed us of the attempted suicide. Ms Collic wrote back acknowledging the letter and expressing concern, but not accepting liability. The second letter from the Moyers was in May 2000, and updated us as to the position. We did not respond to this letter as it was placed in the hands of our insurers. The delay between the alleged incident and the Moyer's notification essentially made it impossible for us to investigate the incident although our Scottish solicitors advised us that to do so may interfere in the legal process in any event. However, I am aware that the police have since done a check on Mr Carroll and that he has no criminal record.

Sworn at Malvern in the County of Worcester)

This 1ST day of May 2003)

Before me, W.J. Lewis)

A Solicitor/Commissioner for Oaths

J. Shaddick